

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, APRIL MUNIZ, MARCUS  
MARTIN, NATALIE ROMERO, CHELSEA  
ALVARADO, THOMAS BAKER and JOHN  
DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,  
CHRISTOPHER CANTWELL, JAMES  
ALEX FIELDS, JR., VANGUARD  
AMERICA, ANDREW ANGLIN,  
MOONBASE HOLDINGS, LLC, ROBERT  
“AZZMADOR” RAY, NATHAN DAMIGO,  
ELLIOT KLINE a/k/a/ ELI MOSELY,  
IDENTITY EVROPA, MATTHEW  
HEIMBACH, MATTHEW PARROTT a/k/a  
DAVID MATTHEW PARROTT,  
TRADITIONALIST WORKER PARTY,  
MICHAEL HILL, MICHAEL TUBBS, LEAGUE  
OF THE SOUTH, JEFF SCHOEP, NATIONAL  
SOCIALIST MOVEMENT, NATIONALIST  
FRONT, AUGUSTUS SOL INVICTUS,  
FRATERNAL ORDER OF THE ALT-  
KNIGHTS, LOYAL WHITE KNIGHTS OF THE  
KU KLUX KLAN, and EAST COAST  
KNIGHTS OF THE KU KLUX KLAN a/k/a  
EAST COAST KNIGHTS OF THE TRUE  
INVISIBLE EMPIRE,

Defendants.

**Civil Action No. 3: 17-cv-00072-NKM**

**MOTION FOR *PRO HAC VICE* ADMISSION OF RAYMOND P. TOLENTINO**

Pursuant to Rule 6(d) of the Local Rules for the United States District Court for the  
Western District of Virginia, I, Robert T. Cahill, an attorney admitted to practice in this Court,

and counsel of record in the instant proceeding, hereby moves the Court for the admission of Raymond P. Tolentino, Esq. to appear *pro hac vice* on behalf of the Plaintiffs in the above captioned case and in support thereof state as follows:

1. Mr. Tolentino is an attorney with Kaplan Hecker & Fink LLP, 350 Fifth Avenue, Suite 7110, New York, NY 10118, Tel: (212) 763-0883, Email: rtolentino@kaplanhecker.com.

2. Mr. Tolentino is qualified and licensed to practice law and is a bar member in good standing in the State of New York (Registration No. 5162425 – Date of Admission: July 16, 2016) and the District of Columbia (Registration No. 1028781 – Date of Admission: October 5, 2015). He is also a bar member in good standing with the United States District Court for the Eastern District of New York (Date of Admission: Jan. 23, 2015), the United States District Court for the Western District of Michigan (Date of Admission: Jun. 10, 2020), as well as the United States Courts of Appeals for the Second, Third, Fourth, Fifth, Sixth, Ninth, Eleventh, D.C. and Federal Circuits.

3. Mr. Tolentino agrees to submit to and comply with the appropriate rules of procedure as required in the case for which he is applying to appear *pro hac vice* as well as the rules and standards of professional conduct applicable to all lawyers admitted to practice before this Court.

WHEREFORE, for the reasons stated above, it is requested that this Court grant this motion and permit Raymond P. Tolentino, Esq. to appear *pro hac vice* on behalf of Plaintiffs in the above captioned case, and to appear at hearings or trials in the absence of an associated member of the bar of this Court.

Dated: June 30, 2020

Respectfully submitted,

/s/ Robert T. Cahill

Robert T. Cahill (VSB 38562)

COOLEY LLP

11951 Freedom Drive, 14th Floor

Reston, VA 20190-5656

Telephone: (703) 456-8000

Fax: (703) 456-8100

Email: rcahill@cooley.com

*Counsel for Plaintiffs*

### CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2020, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

Justin Saunders Gravatt  
David L. Hauck  
David L. Campbell  
Duane, Hauck, Davis & Gravatt, P.C.  
100 West Franklin Street, Suite 100  
Richmond, VA 23220  
jgravatt@dhdglaw.com  
dhauck@dhdglaw.com  
dcampbell@dhdglaw.com

*Counsel for Defendant James A. Fields, Jr.*

Bryan Jones  
106 W. South St., Suite 211  
Charlottesville, VA 22902  
bryan@bjoneslegal.com

*Counsel for Defendants Michael Hill,  
Michael Tubbs, and League of the South*

W. Edward ReBrook  
The ReBrook Law Office  
6013 Clerkenwell Court  
Burke, VA 22015  
edward@rebrooklaw.com

*Counsel for Defendants National Socialist  
Movement, Nationalist Front and Jeff Schoep*

James E. Kolenich  
Kolenich Law Office  
9435 Waterstone Blvd. #140  
Cincinnati, OH 45249  
jek318@gmail.com

Elmer Woodard  
5661 US Hwy 29  
Blairs, VA 24527  
issuecrooks@comcast.net

*Counsel for Defendants Matthew Parrott,  
Traditionalist Worker Party, Jason Kessler,  
Nathan Damigo, and Identity Europa, Inc.  
(Identity Evropa)*

I further hereby certify that on June 30, 2020, I also served the following non-ECF participants, via electronic mail, as follows:

Elliott Kline a/k/a Eli Mosley  
eli.f.mosley@gmail.com  
deplorabletruth@gmail.com

Matthew Heimbach  
matthew.w.heimbach@gmail.com

Christopher Cantwell  
christopher.cantwell@gmail.com

Vanguard America  
c/o Dillon Hopper  
dillon\_hopper@protonmail.com

Robert Azzmador Ray  
azzmador@gmail.com

Richard Spencer  
richardbspencer@gmail.com

s/ Robert T. Cahill

Robert T. Cahill (VSB 38562)

COOLEY LLP

11951 Freedom Drive, 14<sup>th</sup> Floor

Reston, VA 20190-5656

Telephone: (703) 456-8000

Fax: (703) 456-8100

Email: rcahill@cooley.com

*Counsel for Plaintiffs*